

JAP:KDE

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

15 M 362

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 841(a)(1) and  
841(b)(1)(C))

ROMANO ZURLINI,

Defendant.

-X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER HERZOG, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about April 20, 2015, within the Eastern District of New York, the defendant ROMANO ZURLINI did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C)).

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. On or about April 20, 2015, the defendant ROMANO ZURLINI, a citizen of Italy, arrived at John F. Kennedy International Airport (“JFK”) in Queens, New

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

York aboard Delta Airlines Flight 494 from Santo Domingo, Dominican Republic.

Subsequently, the defendant had a connecting flight from JFK to Barcelona, Spain.

2. The defendant was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented a black knapsack and a small carry-on roller suitcase for inspection.

3. A search of the black knapsack revealed that the back panel was unusually thick. The defendant was then taken to a separate search room where the knapsack was probed, revealing a white powdery substance that field-tested positive for the presence of cocaine.

4. The total approximate gross weight of the cocaine recovered was 2,909.8 grams.

5. After he was placed under arrest, the defendant was read his Miranda rights in Spanish, which he appeared to understand and voluntarily waive. The defendant

then stated in Spanish, in sum and substance and in part, that he knew that he had drugs in his knapsack, although he was not certain which type of drug he was possessing.

WHEREFORE, your deponent respectfully requests that the defendant ROMANO ZURLINI be dealt with according to law.

Dated: Brooklyn, New York  
April 21, 2015

  
CHRISTOPHER HERZOG  
Special Agent  
United States Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
21st day of April, 2015

  
THE HONORABLE VERA M. SCANLON  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK